

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

SAXON INNOVATIONS LLC,

Plaintiff,

v.

NOKIA CORP., ET AL.,

Defendants.

CIVIL ACTION NO. 6:07-cv-490 LED-JDL

JURY

JOINT MOTION TO DISMISS

Plaintiff Saxon Innovations, LLC (“Saxon”) and Defendants LG Electronics Inc., LG Electronics U.S.A., Inc., and LG Electronics MobileComm U.S.A., Inc. (collectively, “LGE Defendants”) have settled their respective claims for relief asserted in this case.

NOW, THEREFORE, Saxon and LGE Defendants, though their attorneys of record, request this Court to dismiss all claims asserted in this case against each other with prejudice and with all attorneys’ fees, costs of court and expenses borne by the party incurring the same.

A proposed Order accompanies this motion.

Dated: August 3, 2009

Respectfully submitted,

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ Collin W. Park
Winstol D. Carter, Jr.
State Bar No. 03932950
1000 Louisiana Street, Suite 4200
Houston, Texas 77002
(713) 890-5000 Telephone
(713) 890-5001 Facsimile
wcarter@morganlewis.com

Collin W. Park (*Admitted Pro Hac Vice*)
1111 Pennsylvania Ave., N.W.
Washington, DC 20004
(202) 739-3000 Telephone
(202) 739-3001 Facsimile
cpark@morganlewis.com

ATTORNEYS FOR DEFENDANTS
LG ELECTRONICS INC.,
LG ELECTRONICS U.S.A., INC., AND
LG ELECTRONICS MOBILECOMM U.S.A., INC.

WARD & SMITH LAW FIRM

By: /s/ William D. Belanger
T. John Ward, Jr.
State Bar No. 00794818
111 W. Tyler St.
Longview, Texas 75601
(903) 757-6400 Telephone
(903) 757-2323 Facsimile
jw@jwfirm.com

PEPPER HAMILTON, LLP

William D. Belanger (*Admitted Pro Hac Vice*)
Michael T. Renaud (*Admitted Pro Hac Vice*)
Ibrahim M. Hallaj (*Admitted Pro Hac Vice*)
Matthew D. Durell (*Admitted Pro Hac Vice*)
125 High Street, 15th Floor
Boston, MA 02110
(617) 204-5100 Telephone
(617) 204-5150 Facsimile

ATTORNEYS FOR PLAINTIFF
SAXON INNOVATIONS, LLC

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document has been served on all counsel of record via electronic mail on August 3, 2009.

/s/ Collin W. Park

Collin W. Park